

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAWN ANGELIQUE RICHARD,

Plaintiff,

v.

SEAN COMBS, HARVE PIERRE, DADDY’S HOUSE
RECORDING STUDIO, BAD BOY ENTERTAINMENT
LLC, BAD BOY RECORDS LLC, BAD BOY
ENTERTAINMENT HOLDINGS INC, BAD BOY
PRODUCTIONS HOLDINGS INC, BAD BOY BOOKS
HOLDINGS INC, 1169 CORP f/k/a SEAN COMBS
MUSIC INC, SEAN COMBS CAPITAL LLC, CE OpCo,
LLC f/k/a COMBS ENTERPRISES, LLC, UMG
RECORDINGS, INC., JANICE COMBS PUBLISHING
LLC, JANICE COMBS PUBLISHING HOLDINGS INC,
LOVE RECORDS INC, TRI STAR SPORTS AND
ENTERTAINMENT GROUP INC, DOE
CORPORATIONS 1-10, AND DOE DEFENDANTS 11-
20,

Defendants.

Case No. 24-cv-06848 (KPF)

NOTICE OF MOTION

Oral Argument Requested

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, dated May 16, 2025, and upon all proceedings had herein, Defendants Sean Combs, Harve Pierre, Daddy’s House Recordings, Inc. (incorrectly sued as Daddy’s House Recording Studio), Bad Boy Entertainment LLC, Bad Boy Entertainment Holdings Inc., Bad Boy Productions Holdings Inc., Bad Boy Books Holdings Inc., 1169 Corp f/k/a Sean Combs Music Inc., Sean Combs Capital LLC, CE OpCo, LLC f/k/a Combs Enterprises, LLC, Janice Combs Publishing LLC, Janice Combs Publishing Holdings Inc., Love Records Inc., Bad Boy Records LLC and UMG Recordings, Inc. (collectively, the “Defendants”) will move this Court, in accordance with Fed. R. Civ. P. 12(b)(6), before the Hon. Katherine Polk Failla, in Courtroom 618 of the Thurgood

Marshall U.S. Courthouse, 40 Foley Square, New York, New York 10007, for an order dismissing all claims in the Amended Complaint against the Defendants with prejudice.

Dated: New York, New York
May 16, 2025

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